

### **REMARKS**

Applicant has carefully reviewed and considered the Office Action mailed on April 15, 2011, and the references cited therewith.

#### **Drawings**

The drawings were objected to under 37 C.F.R. § 1.83(a) as not showing the second computer system as claimed. While Applicants respectfully disagree, Applicants have submitted herewith a Replacement Sheet in which FIG. 1 has been amended to show a first and a second computer system. The written specification has also been amended to reflect the amendment to FIG. 1. Support for this amendment may be found, for example, in at least paragraphs [0028] and [0030]. Accordingly, Applicants respectfully submit that the objection to the drawings may be withdrawn upon reconsideration.

#### **Rejection of the Claims -- 35 U.S.C. § 112**

Claims 1-3, 10 and 19 were rejected under 35 USC § 112, first paragraph, as failing to comply with the written description requirement. The claims contain subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventors, at the time the application was filed, had possession of the claimed invention.

In particular, the Office Action states that the specification does not provide support for a first and a second computer system. Applicants respectfully submit that at least paragraphs [0028] - [0030] provide support for these recitations. In particular, paragraph [0028] states, *inter alia*:

An application program executing on a publisher's computer system called a "maker" component herein may be used to create the linkages between these data items. The maker may be used by a publisher (or in some cases by a sophisticated user) to make an interactive multimedia product based on an existing traditional paper book (or possibly a newly published book), with limited manual work.

Paragraph [0029] states, *inter alia*:

In one embodiment, the publisher's computer system may be the same as the user's computer system for the case where the interactive multimedia product and/or the book are produced by the user or another person at the user's site (e.g., a parent prepares the linkages for use by a child).

Paragraph [0030] states, *inter alia*:

In one embodiment, the publisher provides the multimedia files when operating the maker component and installs them in the databases distributed to the user's computer system with the player component. In another embodiment, the publisher provides links to the multimedia files accessible over a network such as the Internet. In this embodiment, the player component obtains the files as needed using a known file transfer protocol or the well known hyper text transfer protocol (HTTP).

Accordingly, Applicants respectfully submit that one of ordinary skill in the art would readily understand that the specification clearly makes a distinction between a publisher's computer system and a user's computer system. Accordingly, Applicants respectfully submits that this rejection may be withdrawn upon reconsideration. In the event that the Examiner disagrees, clarification is respectfully requested.

Regarding the rejection of claims 1, 10, and 19 under 35 U.S.C. § 112 first and second paragraphs of the recitation "wherein the multimedia content is different from the object", While Applicants disagree with this rejection, this language from the claims. As such, the rejection is believed to be moot.

*Rejection of the Claims -- 35 U.S.C. §§ 102 & 103*

Claims 1-5, 9-14, 18-19 and 21-22 were rejected under 35 U.S.C. § 102(b) as being anticipated by LeKuch et al. (US Publication No. 2002/0041271, hereinafter "LeKuch). Claims 6-7, 15-16 and 20 were rejected under 35 U.S.C. § 103(a) as unpatentable over LeKuch. Applicants respectfully disagree and request reconsideration and withdrawal in view of the following comments.

Independent claim 1 has been amended to recite, *inter alia*,

generating a database external to the second computer system, the database comprising a book content database, a multimedia database, and an action library including related response information corresponding to the position of the object; determining a position of an object selected by the user using the second

computer system; and

receiving response information from the database, the response information corresponding to the object selected by the user; and

performing said response on the second computer, said response comprising playing an audio file.

Applicants respectfully submit that LeKuch does not teach or suggest these recitations. In contrast, LeKuch merely provides that writings and drawings made on paper pad 80 can be conveyed by input pen 40, processed by CPU 60, and stored in memory 70 as an electronic (i.e., virtual) representation of writings and drawings created by the user on paper pad 80. LeKuch, paragraph [0024]. Thus, the electronic (i.e., virtual) representation of writings/drawings may be understood to be merely the same as the physical writings/drawings, albeit in electronic form. As best understood, LeKuch is directed at overcoming the difficulty of associating pages of a physical writing with pages of an electronic representation of the physical writings. LeKuch, paragraph [0008].

Nothing in LeKuch is understood to teach or suggest generating a database that is external to the second computer as generally recited in Applicants' amended, independent claim 1. Moreover, nothing in LeKuch is understood to teach or suggest receiving response information from the database, wherein the response information corresponding to the object selected by the user as generally recited in Applicants' amended, independent claim 1. Accordingly, Applicants respectfully submit that the rejection of independent claim 1 under 35 U.S.C. §§ 102 and/or 103 may be withdrawn.

Independent claims 10 and 19 have been amended to include language similar to that discussed above with respect to independent claim 1. As such, Applicants respectfully submit that the rejection of independent claims 10 and 19 under 35 U.S.C. §§ 102 and/or 103 may be withdrawn for at least similar reasons.

The remaining claims depend, either directly or indirectly, from independent claims 1, 10, or 19. As such, the remaining claims are also believed to be allowable by virtue of their own patentable recitations in addition to their dependency from independent claims 1, 10, or 19.

For at least the foregoing reasons, Applicants respectfully submit that all the pending claims are in a proper condition for allowance and that all of the rejections of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment

does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper.

Applicants respectfully submit that the claims are in condition for allowance and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicants' attorney (603-668-6560) to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 50-4238.

Respectfully submitted,

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